

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
2 PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
3 ELIZABETH D. KURLAN (CABN 255869)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7298
Facsimile: (415) 436-6748
Elizabeth.Kurlan@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHENGJIE LI,

Plaintiff,

V.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY.

Defendant

Case No. 3:24-cv-07508 TSH

**SECOND STIPULATION TO EXTEND TIME
FOR DEFENDANT'S RESPONSE TO
PLAINTIFF'S COMPLAINT; AND
[PROPOSED] ORDER**

On January 3, 2025, the Court granted the parties' first stipulation to extend time for Defendant's response to Plaintiff's complaint. *See* Dkt. 12. The parties, through their undersigned attorneys, hereby stipulate to an additional extension of time for Defendant's response to Plaintiff's complaint. Defendant will file their response on or before March 5, 2025. The parties make this request because Defendant needs a brief period of additional time to confer and prepare their response. In view of the agreed-upon extension for Defendant's response to the complaint, the parties request that, Defendant must file their motion for summary judgment by May 5, 2025.

1 Dated: February 3, 2025

Respectfully submitted,¹

2 ISMAIL J. RAMSEY
United States Attorney

3
4 */s/ Elizabeth D. Kurlan*
ELIZABETH D. KURLAN
5 Assistant United States Attorney
6 Attorneys for Defendant

7 Dated: February 3, 2025

8 */s/ Kristina David*
9 KRISTINA DAVID
David Strashnoy Law, PC
Attorney for Plaintiff

10
11
12 [PROPOSED] ORDER

13 Pursuant to stipulation, IT IS SO ORDERED.

14
15 Date: February 4, 2025

16 
THOMAS S. HIXSON
17 United States Magistrate Judge

18
19
20
21
22
23
24
25
26
27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
signatories listed herein concur in the filing of this document.

1 **DECLARATION OF ELIZABETH D. KURLAN**

2 I, Elizabeth D. Kurlan, declare and state as follows:

3 1. I am an Assistant United States Attorney in the United States Attorney's Office for the
4 Northern District of California and counsel of record for the federal Defendant in the above-captioned
5 action.

6 2. On January 3, 2025, the Court granted the parties' first stipulation to extend time for
7 Defendant's response to Plaintiff's complaint. *See* Dkt. No. 12.

8 3. I have been conferring with Plaintiff's counsel and we determined that a brief period of
9 additional time is necessary for me to discuss this case with the agency and prepare Defendant's
10 response to the complaint.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

14 DATED: February 3, 2025

15 _____
16 /s/ Elizabeth D. Kurlan
17 ELIZABETH D. KURLAN
18 Assistant United States Attorney
19
20
21
22
23
24
25
26
27
28